

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DANIEL KAMEN

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Criminal No. 04-10384-PBS

FILED
IN CLERKS OFFICE

2005 MAR -7 P 4:43

U.S. DISTRICT COURT
DISTRICT OF MASS.

JOINT REPORT UNDER RULE 116.5(A)

The parties hereby submit the following pursuant to Local Rule 116.5(A).

(1) The parties do not at this time believe that they need relief from the timing requirements imposed by Local Rule 116.3. Should such relief become necessary, they will notify the Court.

(2) Each party requests discovery regarding expert witnesses. The parties propose that the United States will provide expert discovery 30 days prior to trial, and the Defendant will provide reciprocal discovery 15 days prior to trial.

(3) At this time, neither party anticipates providing additional discovery other than that related to expert witnesses.

(4) The defendant anticipates filing dispositive motions, but needs additional time in which to determine the number and nature thereof.

(5) The parties request that the Court exclude the period from December 28, 2004 through January 24, 2005 due to the automatic discovery period. The parties further request that the time between January 24 and the date of the Interim Status Conference requested below be excluded from calculation under the

Speedy Trial Act in the interests of justice.

(6) In the event this case proceeds to trial, the parties anticipate that it would last 7 days.

(7) The parties request that an Interim Status Conference be scheduled for on or about April 28, 2005.

Respectfully submitted,

DANIEL KAMEN
by his attorney

MICHAEL J. SULLIVAN
United States Attorney

Peter Elikann / DTS
PETER ELIKANN

By: Dena T. Sacco
DENA T. SACCO
Assistant U.S. Attorney

Dated: March 7, 2005